

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

LYNDON SCOTT,
a/k/a "Schizzy,"
a/k/a "Womach,"

Defendant

Criminal No. 19cr 10384

Violations:

Count One: Possession with Intent to Distribute
Cocaine Base
(21 U.S.C. § 841(a)(1))

Count Two: Felon in Possession of Firearm and
Ammunition
(18 U.S.C. § 922(g)(1))

Count Three: Possession of Firearm in
Furtherance of a Drug Trafficking Offense
(18 U.S.C. § 924(c))

Drug Forfeiture Allegation:
(21 U.S.C. § 853)

Firearm Forfeiture Allegation:
(18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Possession with Intent to Distribute Cocaine Base
(21 U.S.C. § 841(a)(1))

The Grand Jury charges:

On or about September 30, 2019, in Boston, in the District of Massachusetts, the defendant,

LYNDON SCOTT, a/k/a "Schizzy," a/k/a "Womach,"

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

Felon in Possession of Firearm and Ammunition
(18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

On or about September 30, 2019, in Boston, in the District of Massachusetts, the defendant,

LYNDON SCOTT, a/k/a “Schizzy,” a/k/a “Womach,”

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is, a Taurus 9 millimeter pistol, model PT111 G2A, bearing serial number TL098471, and thirteen rounds of 9 millimeter ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

Possession of a Firearm in Furtherance of a Drug Trafficking Offense
(18 U.S.C. § 924(c))

The Grand Jury further charges:

On or about September 30, 2019, in Boston, in the District of Massachusetts, the defendant,

LYNDON SCOTT, a/k/a “Schizzy,” a/k/a “Womach,”

did knowingly possess a firearm, to wit: a Taurus 9 millimeter pistol, model PT111 G2A, bearing serial number TL098471, in furtherance of a drug trafficking crime, to wit: possession with intent to distribute cocaine base, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1).

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

1. Upon conviction of the offense in violation of Title 21, United States Code, Section 841(a)(1), set forth in Count One of this Indictment, the defendant,

LYNDON SCOTT, a/k/a “Schizzy,” a/k/a “Womach,”

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

FIREARM FORFEITURE ALLEGATION
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds that:

1. Upon conviction of one or more of the offenses in violation of 18, United States Code, Sections 922(g)(1) and 924(c), set forth in Counts Two and Three of this Indictment, the defendant,

LYNDON SCOTT, a/k/a “Schizzy,” a/k/a “Womach,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. a Taurus 9 millimeter pistol, model PT111 G2A, bearing serial number TL098471; and
- b. thirteen rounds of 9 millimeter ammunition,;

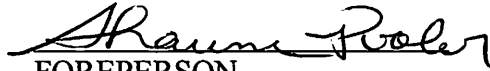
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

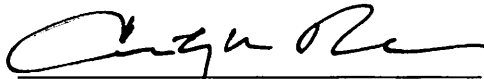
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.


All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL


FOREPERSON


CHRISTOPHER POHL
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: October 9, 2019
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK
10/9/19 @ 11:20am